



State of Idaho
DEPARTMENT OF HEALTH AND WELFARE
Division of Environmental Quality

450 W. State Street
Boise, Idaho 83720

CECIL D. ANDRUS
Governor
RICHARD P. DONOVAN
Director

April 24, 1990

Beth Feeley
U.S. EPA, HW-113
1200 Sixth Ave.
Seattle, WA 98101

Dear Ms. Feeley:

Discussed below are IDHW comments on the Asbestos Removal and PCB Management and Disposal Plans.

Minerals Corporation of Idaho, Inc. (MCII)

Asbestos Removal Plan

1. IDHW or EPA representatives should be present for quarterly inspections and building demolition or renovation activities. MCII should commit to notify the agencies of such activities and make provisions which facilitate agency oversight.
2. MCII should specifically state that persons involved in any future asbestos abatement will receive appropriate asbestos handling training.
3. A disposal site or disposal site options should be identified and discussed in the plan.
4. An asbestos handling plan needs to be provided. MCII does not necessarily need to produce a complete new plan. Rather, an existing plan could be adjusted to conditions specific to MCII.

PCB Management and Disposal Plan

MCII does not propose a plan which meets the intent of the Order. Therefore, we have no comments on this plan other than that a comprehensive plan needs to be submitted.

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Gulf Resources and Chemical Corporation (GRCC)

PCB Management and Disposal Plan

1. The primary concern relative to this plan is the narrow scope of sites which will be addressed. A comprehensive PCB Removal and Disposal Plan is needed whether from MCII, GRCC or a combination of the two parties.
2. The IDHW On-Site Coordinator should be consulted in determination of contamination source and extent and present for sampling events. He should also be provided access during removal actions.
3. There is no provision for soil sampling to confirm a successful cleanup. Such sampling needs to be included in the plan.

If you have any questions, please call me at (208) 334-5879.

Sincerely,



Rob Hanson
Bunker Hill Supervisor

RH:mh

cc: Scott Peterson
Source file
Reading file